

**CABOT CORPORATION**

P. O. BOX 188, TUSCOLA, ILLINOIS 61953

TELEPHONE AREA CODE 217
TUSCOLA 253-3370
TELEX TUSCOLA 910-863-2542

0418080001 - DOUGLAS
CABOT CORP
COMPLIANCE FILE

August 7, 1986

Mark A. Haney
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706


Dear Mr. Haney:

Enclosed is a copy of the analysis performed on our used oil. This analysis was promised you in our response of July 10, 1986 (Item #1) to your Compliance Inquiry Letter of June 26, 1986.

I have also sent a copy of the analysis to our waste oil recycling company, Moreco Energy (Pierce Waste Oil). They will apply for a permit to pick up and recycle our waste oil.

If we need to do anything else please advise me. My phone number is (217) 253-3370.

Sincerely,


Randy Bergeson

RB:pjr
PR601

Enclosure

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EPA Region 5 Records Ctr.



298857



TEI ANALYTICAL, INC.

7177 N. AUSTIN • NILES, ILLINOIS • 60648 • 312/647-1345



July 30, 1986

LABORATORY REPORT #5026

Mr. James Teeters
Cabot Corporation
Route 36 - P.O. Box 188
Tuscola, Illinois 61953

P.O. 63178

Sample received:
July 7, 1986

[TEI-32088] Used Oil Sample

Flash Point, °F	> 200
Distillation	6% water & 94% oil
Phenol, mg/l	10
Total Halogens as Chlorine, ppm	1010.

EP Toxicity

Arsenic, mg/l	< 0.05
Barium, mg/l	< 0.5
Cadmium, mg/l	< 0.02
Chromium, mg/l	0.4
Lead, mg/l	6.0
Mercury, mg/l	< 0.1
Selenium, mg/l	< 0.05
Silver, mg/l	< 0.2

g. e. m. f. s.

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Response to Compliance Inquiry Letter of June 26, 1986

- 1) The waste oil accumulated in our waste oil storage tank is composed of used motor oil.

Solvents and paint thinners are stored in drums for later shipment to a HWM facility for incineration. We therefore feel that our waste oil is not hazardous. In order to verify this, we have taken a sample from our waste oil tank and have sent it to TEI Analytical Laboratories for the following analysis: flash point, major components, EP toxic metals, total halogens, and phenol.

Test results will be forwarded to you as soon as they are available.

- 2) Inspections of the vaporizer bottoms treatment tanks are being done. Attached is a copy of last month's inspection sheets. The inspection sheet does not include all the required information, therefore I have made a new inspection sheet, which is attached. In the past the vaporizer bottom tanks were used only two or three times a year for two days at a time. Recently we have contracted with Rollins Environmental Co., to incinerate our vaporizer bottoms. Therefore it is possible we may never use the treatment tanks again.
- 3) Attached is a current list of the personnel you requested except for the "D" acid area operators. The "D" acid area operators were not included because they do not handle hazardous wastes. Job descriptions for the Environmental Manager (Item 11, Training Manual 2.3.2) and security personnel (Item 6, Security Procedures) are in the Part B application. Job descriptions for the ABC acid area operators, laboratory technicians and safety manager are attached. This list and the job descriptions will be added to the personnel training section of the Part B Permit Application.
- 4)
 - f) See RCRA Part B Permit Application Item 10, Emergency Guide 5.1.9.
 - g) See RCRA Part B Permit Application Item 10, Emergency Guide 5.2.4.1 and 5.2.6.3. Also review attached revisions for handling Silicon Tetrachloride releases.
 - h)
 - 1) See RCRA Part B Permit Application Item 10, Emergency Guide "Outline of Guidelines for Entering Field Sites of Unknown Chemical Toxicity" 3. Administrative Control of Site
 - 2) See RCRA Part B Permit Application Item 10, Emergency Guide "Outline of Guidelines for Entering Field Sites of Unknown Chemical Toxicity" 8. Decontamination, Maintenance and Storage.
 - i) See the attached revised RCRA Part B Permit Application Item 10, Emergency Guide page 5.2.7.
 - j) See RCRA Part B Permit Application Item 10, Emergency Guide 5.1.12.

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JUL 11 1986